

OGC 74-1189

15 July 1974

MEMORANDUM FOR: See Distribution

SUBJECT : Civil Service Commission Request Concerning
Agency Program Re Conflict of Interests

1. The General Counsel, in his capacity as Ethics Coordinator for the Agency, has received a request from the Civil Service Commission for information concerning our program of reporting outside employment and financial interests. The Commission, which has responsibility and authority for overseeing the Government-wide ethical conduct program under Executive Order No. 11222 of 8 May 1965, has requested this information in connection with a comprehensive review of regulations and guidelines implementing the Executive order which it is now undertaking.

2. In order to respond fully to the Commission's request, your assistance is needed in providing the following information:

- (1) In your Directorate, approximately how many employees are required to file confidential statements of employment and financial interests?
- (2) How many current employees who are required to file have not done so? What action is being taken to secure compliance?
- (3) Of the statements that were filed, how many were filed within the time limits set forth in the Agency's regulations?
- (4) What is your method of noting that a statement has been reviewed?
- (5) Pursuant to the review of these statements, on approximately how many occasions have you found it necessary, for the purpose of insuring that conflict problems do not exist, to consult with an employee who has filed a statement?

- (6) On occasions when consultations have been held, in approximately how many instances have employees been required to divest or otherwise alter their financial interests to avoid conflicts problems?

This information is requested for Fiscal Year 1974 only.

3. We would like to have your response to the above questions by 19 July 1974 in order to provide a timely reply to the Commission. If you have any questions, please call the undersigned on extension [redacted]

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Office of General Counsel

DISTRIBTUION:

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